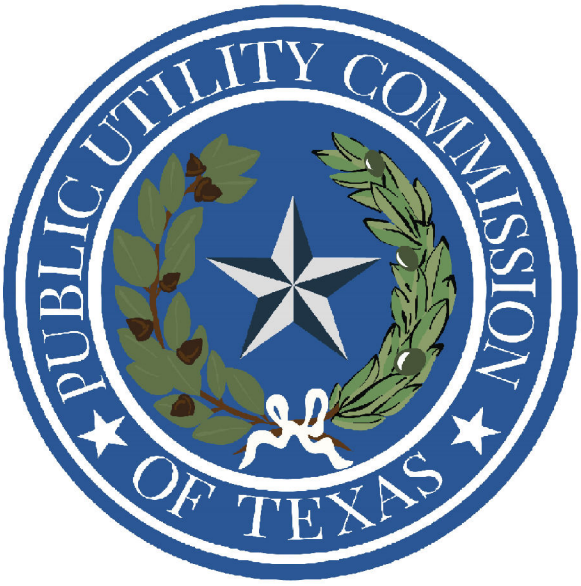

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Project to Submit Emergency Operations Plans and Related Documents under 16 TAC § 25.53

Rayburn Country Electric Cooperative, Inc.

Emergency Operations Plan

Table of Contents

1. EXECUTIVE SUMMARY

1.1 Rayburn Country Electric Cooperative Inc. (RCEC, or Rayburn) is a generation and transmission (G&T) electric cooperative based in Rockwall, Texas. As a G&T, Rayburn receives power through various interconnections with outside entities. Rayburn owns and operates the transmission facilities necessary to carry the power to its Member owned distribution facilities.

1.2 This Emergency Operations Plan (EOP) addresses Rayburn's processes and procedures in response to various emergency conditions. This EOP designates the RCEC personnel responsible for all communications during emergency conditions; requires an inventory of emergency supplies; allows for emergency response staffing modifications; designates specified methods for severe weather identification; outlines required actions of RCEC during a weather emergency; identifies RCEC load shed procedures; addresses responses to pandemics and epidemics; provides guidance on wildfire mitigation and vegetation management; designates the appropriate responses to cyber and physical security incidents; requires annual drills of EOP procedures; and specifies emergency incident reporting procedures. This EOP is a living document that will be reviewed annually and revised from time to time, as necessary.

1.3 PUCT Rule Section Cross-Reference

Rule Section	Description	EOP Location (Pg)
(c)(4)(A)(i)	RECORD OF DISTRIBUTION	Pg 5
(c)(4)(B)	PRIMARY AND BACKUP EMERGENCY CONTACTS	Pg 4
(c)(4)(C)	EOP AFFADAVIT	Pg 6
(d).(1)	APPROVAL AND IMPLENTATION	Pg 8
(d)(2)(A)	COMMUNICATION PLAN	Pg 9
(d)(3)	EMERGENCY INVENTORY SUPPLY PLAN	Pg 10
(d)(4)	EMERGENCY RESPONSE STAFFING PLAN	Pg 11
(d)(5)	SEVERE WEATHER IDENTIFICATION PLAN	Pg 12
(e)(1)(A)	WEATHER EMERGENCY ANNEX	Pg 13
(e)(1)(B)	LOAD SHED ANNEX	Pg 15
(e)(1)(C)	PANDEMIC AND EPIDEMIC ANNEX	Pg 17

1.4 List of Primary and Backup Emergency Contacts:

1.4.1 Primary and backup emergency contacts are listed on the PUC Portal and verified as of February 11, 2022.

1.4.2 Rayburn shall conduct an annual review of the PUC list of Rayburn Emergency Contacts for the applicable functions as part of the annual review of the Rayburn EOP Plan.

2. RECORD OF DISTRIBUTION

2.1 Below are the titles and names of Rayburn employees who have received access to and training on the Rayburn 2022 PUCT EOP.

First name	Last name	Title	completion	id	assignment completed	department	status
Alex	Dobson	People and Communication Coordinator	100	201703	4/8/2022 11:07	Compliance-HR	active
Brennan	Mundt	Transmission System Operator	100	188690	4/8/2022 9:49	Operations	active
Chase	Cole	Senior System Administrator	100	95381	4/11/2022 17:47	IT	active
Christopher	Eisterhold	System Administrator	100	264072	4/12/2022 9:06	IT	active
Christopher	Key	Communications Network Technician	100	171828	4/11/2022 15:06	IT	active
Christian	Nagel	Director of Power Supply	100	158405	4/8/2022 15:10	Operations	active
Christopher	Seaman	Operations Compliance Specialist	100	109421	4/11/2022 9:16	Operations	active
Chase	Snuffer	Chief Information Officer	100	95380	4/11/2022 11:05	IT	active
Dustin	Berry	Transmission System Operator	100	109427	4/11/2022 10:48	Operations	active
Darroll	Bratcher	Meter and Substation Technician	100	109423	4/8/2022 11:04	Operations	active
David	Braun	Chief Financial Officer	100	109424	4/8/2022 11:15	Accounting	active
Danny	Honeycutt III	Journeyman Lineman	100	180519	4/12/2022 8:36	Operations	active
David	Naylor	President/CEO	100	109425	4/8/2022 9:49	Executive	active
Dustin	Sellars	Substation Technician	100	168389	4/12/2022 7:05	Operations	active
Destiny	Tagle	HR Administrative Assistant	100	266943	4/12/2022 12:33	Compliance-HR	active
Dawn	Wagner	Executive Assistant	100	109426	4/8/2022 11:11	Executive	active
Erica	Hilton	Accountant II	100	141372	4/11/2022 15:26	Accounting	active
Frank	Owens	Director of Compliance	100	95384	4/5/2022 17:29	Compliance-HR	active
Gage	Cameron	Systems Administrator	100	171676	4/11/2022 10:11	IT	active
Gentry	Ewing	GIS Analyst & ROW Specialist	100	109428	4/8/2022 11:04	Operations	active
Greg	Froehling	Safety Coordinator	100	109429	4/8/2022 14:21	Compliance-HR	active
Johnny	Alrid	Director of Information Security	100	95383	4/12/2022 9:08	IT	active
Joshua	Brown	Transmission System Operator	100	109436	4/8/2022 10:46	Operations	active
Jan	Davis	Settlement Analyst	100	109433	4/8/2022 12:29	Accounting	active
John	Duhon	IT Project Manager	100	142359	4/11/2022 12:25	IT	active
Jennifer	Edmondson	Asst General Counsel	100	95382	4/11/2022 11:45	Executive	active
Joel	Estrada	Information Assurance Analyst	100	215939	4/8/2022 10:57	IT	active
Joel	Puckett	Warehouse8 and Grounds Technician	100	109435	4/8/2022 15:44	Operations	active
Justin	Sloan	Communications Network Technician	100	109437	4/11/2022 15:05	IT	active
James	Wallace	System Operations Manager	100	109432	4/11/2022 12:53	Operations	active
Katherine	Garcia	System Engineer I	100	109438	4/11/2022 11:25	Operations	active
Kasey	Henderson	Journeyman Lineman	100	180518	4/11/2022 17:22	Operations	active
Krishna	Muduganti	Senior System Administrator	100	109439	4/8/2022 11:09	IT	active
Lisa	Carter	Compliance Analyst	100	176735	4/5/2022 14:57	Compliance-HR	active
Luke	Jones	Transmission System Operator	100	134338	4/12/2022 12:18	Operations	active
McKayla	Dickey	Settlement Analyst	100	149927	4/8/2022 17:48	Accounting	active
Michael	Smith	Transmission System Operator	100	109442	4/9/2022 4:22	Operations	active
Mike	West	Warehouse and Materials Manager	100	109443	4/11/2022 8:46	Operations	active
Nadine	Ontiveros	Chief Human Resources Officer	100	158404	4/8/2022 15:07	Executive	active
Pam	Beers	Executive Assistant	100	109444	4/12/2022 7:42	Accounting	active
Petra	Mashingaidze	Accountant II	100	109445	4/11/2022 12:27	Accounting	active
Patrick	Smith	Network Administrator	100	116723	4/11/2022 10:14	IT	active
Robert	Bartek	Information assurance Analyst	100	122320	4/8/2022 12:53	IT	active
Chase	Brand	System Administrator	100	242590	4/11/2022 15:23	IT	active
Rickey	Hebert	Compliance Manager	100	95385	4/5/2022 14:14	Compliance-HR	active
Robert	Helle	Transmission Line Superintendent	100	115357	4/11/2022 15:31	Operations	active
Raul	Solis	Journeyman Lineman	100	188691	4/12/2022 9:15	Operations	active
Shannon	Beber	Project Coordinator	100	109448	4/11/2022 9:44	Operations	active
Staci	Bratcher	Director of Human Resources	100	109449	4/12/2022 15:27	Compliance-HR	active
Scott	Donham	System Engineer II	100	109447	4/8/2022 9:39	Operations	active
Stephen	Geiger	Chief Operating Officer	100	109451	4/8/2022 16:49	Executive	active
Stephanie	Hunt	Controller	100	109450	4/8/2022 15:27	Accounting	active
Sara	Richard	Staff Attorney	100	134344	4/8/2022 10:54	Compliance-HR	active
Travis	Beistle	Transmission System Operator	100	174269	4/11/2022 6:59	Operations	active
Tyler	Hockenberry	System Engineer I	100	171675	4/12/2022 8:45	Operations	active
Zachary	Hernandez	Transmission System Operator	100	109453	4/11/2022 18:43	Operations	active

3. PUCT EOP AFFIDAVIT

AFFIDAVIT

(16 TAC § 25.53 – Electric Service Emergency Operations Plans)

STATE OF TEXAS §
§
COUNTY OF ROCKWALL §

Before me, the undersigned Notary Public, personally appeared David A. Naylor, as President and CEO of Rayburn Country Electric Cooperative, Inc. (RCEC), who, being by me duly sworn, stated under oath as follows:

1. That he is the highest-ranking representative, official, or officer of RCEC with binding authority over RCEC;

2. That all relevant RCEC operating personnel are familiar with and have received training on the contents of the RCEC Emergency Operations Plan (EOP), and such personnel are committed to following the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;

3. That the EOP has been reviewed and approved by the appropriate executives;

4. That 16 TAC §25.53 is a recently enacted rule that newly applies to RCEC; that the drills required pursuant to 16 TAC §25.53 will be conducted during the next ERCOT initiated severe weather drill; and that RCEC will submit to the PUC documentation of completion of said drills thereafter;

5. That the EOP or an appropriate summary has been distributed to local jurisdictions as needed;

6. That RCEC maintains a Business Continuity Plan that addresses returning to normal operations after disruptions caused by an incident; and

7. That RCEC emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest National Incident Management System training, specifically IS- 700, IS-800, IS-100, and IS-200.

Affiant states nothing further.

IN WITNESS WHEREOF, this 14th day of April, 2022.

David A. Naylor, as President and CEO of
Rayburn Country Electric Cooperative, Inc.

ACKNOWLEDGEMENT

STATE OF TEXAS §
§
COUNTY OF ROCKWALL §

Before me, the undersigned authority, on this day personally appeared David A. Naylor, the President and CEO of Rayburn Country Electric Cooperative, Inc., a Texas electric nonprofit cooperative corporation, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed, in the capacity therein stated and that he/she was authorized to do so.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 14th day of April, 2022.

Dawn Dais Wagner
Notary Public, State of Texas

DAWN DAIS WAGNER
Notary Public, State of Texas
Comm. Expires 12-02-2023
Notary ID 130455791

4. APPROVAL AND IMPLEMENTATION

4.1 This EOP is the most recently approved EOP of Rayburn and supersedes all previous Rayburn EOPs as of April 15, 2022.

Document Owners

Department	Authority	Name	Date
Operations	President / CEO	David Naylor	03/29/2022

Document Management

Effective Date	Review Cycle	Confidentiality
04/15/2022	Prepared for Rayburn	Confidential (non-private)

Version History

Version	Date	Change Tracking:
0	05/22/2015	New Plan
1	07/12/2017	Updated Plan
2	04/15/2021	Reviewed and updated Plan
3	03/29/2022	Moved to New Template, updated content for new PUC Rule 25.53

5. RAYBURN COMMUNICATION PLAN

5.1 All communications to and from the following entities will be conducted via the Rayburn Communications Team: the public, the media, customers, the commission, the Office of Public Utility Counsel (OPUC), local and state government entities (except for law enforcement & first responders in an emergency) & officials, and emergency operations centers.

5.2 The Rayburn Control Center, staffed 24/7, is responsible for communicating with the region Reliability Coordinator (ERCOT).

5.3 The Control Center will communicate with law enforcement and first responders for initial response to emergencies.

5.4 RCEC does not directly serve retail customers (load). Load is served by Rayburn's four (4) Member cooperatives who directly serve customers and critical load customers. As such each of RCEC's four (4) Member cooperative's will utilize their own telephone systems and complaint-handling procedures for communicating with the public, the media, customers, and critical load customers directly served during an emergency.

5.5 Communications Team

5.5.1 Contact Designations:

Primary: David Naylor, President / CEO

Alternate: Stephen Geiger, Chief Operating Officer

6. RAYBURN EMERGENCY INVENTORY SUPPLY PLAN

6.1 Rayburn maintains an inventory of emergency supplies to maintain operations that includes:

6.1.1 SYSTEM OPERATIONS STAFF:

Bedding, water, food to support stranded operations staff during an emergency event.

6.1.2 SUPPORT VEHICLES:

Onsite fuel storage (Gasoline and Diesel), with fuel refill contracts.

6.1.3 SYSTEM FACILITIES:

Inventory to recover from a single loss scenario with non-catastrophic damage. (e.g. common switch-station equipment, or one mile of 138kV transmission line)

7. RAYBURN EMERGENCY RESPONSE STAFFING PLAN

7.1 During periods when an emergency condition (such as projected severe weather) may impact travel or require extended staffing coverage, the Rayburn Chief Operating Officer, or designee may direct alternate staffing hours and or duties as needed to maintain reliable system operations.

7.2 Rayburn's internal Emergency Operations Plan (Rayburn document EOP-011-ROP-01), which provides Rayburn's Emergency Staffing protocols, is on file in an unredacted form with ERCOT. The general outline of these staffing plans are as follows:

7.3 Rayburn maintains a 24/7 Control Center, staffed by NERC and ERCOT certified System Operators.

7.4 Rayburn maintains a roster of support personnel who are to be available 24/7. The Rayburn System Operator is authorized by Rayburn's Emergency Operations Plan to enlist the assistance of these personnel at System Operators discretion.

7.5 When ERCOT issues an Emergency Notice affecting Rayburn's operating area, Rayburn will:

7.5.1 Assess having two System Operators on shift in the Control Center

7.5.2 Provide for 24/7 engineering support availability

8. RAYBURN SEVERE WEATHER IDENTIFICATION PLAN

8.1 Rayburn subscribes to meteorological services. The meteorological service identifies weather threats up to 10 days in advance and provides Rayburn site-specific daily threat reports forecasting severe weather conditions. Additionally, the service provides advance warnings and alerts for imminent weather conditions, including critical temperature advisories, lightning, heavy rain, hail, strong winds, drought, and threat of tornadic activity.

8.2 Rayburn System Operators will continuously monitor weather conditions for reliability impacts using subscription weather monitoring services located in control rooms, and initiate emergency operations when these conditions affect the reliability of the BES.

8.3 ERCOT may issue weather related communications in the form of Operating Condition Notices (OCNs), Advisories, Watches, and Emergency Notices.

8.4 These alerts are shared with operations employees and affected entities using multiple-party burst communications. When conditions warrant, System Operations will provide notice to all employees to take appropriate actions.

9. ANNEX 1: RAYBURN WEATHER EMERGENCY

9.1 Rayburn's internal Emergency Operations Plan (Rayburn document EOP-011-ROP-01), which provides Rayburn's Severe and Extreme Weather Reliability Impact protocols, is on file in an unredacted form with ERCOT. The general outline of these plans are as follows:

9.2 Rayburn System Operators may prepare for extreme weather conditions by:

9.2.1 Increasing situation awareness.

9.2.2 Notifying affected Field Personnel.

9.2.3 Delaying or canceling scheduled maintenance/repairs on the system.

9.2.4 Dispatching field and/or IT personnel to Rayburn facilities to quickly respond to operating emergencies caused by weather events.

9.3 The following describes the checklist used in responding to an impending cold-weather emergency:

9.3.1 Verify Fuel levels in:

9.3.1.1 Onsite storage.

9.3.1.2 Vehicle fleet

9.3.2 Verify personnel availability for staffing plans if Emergency operations are initiated, including:

9.3.2.1 24/7 engineering support.

9.3.2.2 Additional System Operators present in the control center during emergency operations/load shed.

9.3.2.3 Field personnel available to respond to forced outages and emergency conditions.

9.3.3 Verify snow/ice removal equipment and salt availability for control centers.

9.3.4 The in-force emergency operations plan (Rayburn's EOP-011-ROP-01) includes restoring outaged equipment in response to a pending emergency and this action is covered in those plans.

9.4 When "Emergency" operations are declared in response to a cold weather emergency:

9.4.1 Ensure additional System Operators are present in the Rayburn control center during all emergency operations and/or load shed.

9.4.2 Provide 24/7 engineering on-call support.

9.4.3 Stage cold weather gear with field personnel or inside field vehicles to provide for effective deployment.

9.4.4 Review load shed procedures, including voltage reduction, and discuss any current issues which may affect implementation of these procedures with the member cooperatives.

9.5 The following describes the checklist used in responding to an impending hot weather emergency:

9.5.1 Monitor system conditions and notify ERCOT when transmission facility elements reach maximum safe operating limits as soon as practical.

9.5.2 Ensure that Dispatch Instructions for the Rayburn system or on behalf of represented TSPs or Distribution Service Providers (DSPs) are carried out as issued.

9.5.3 Cancel outages as necessary.

9.5.4 Reconfigure the transmission system as necessary.

9.5.5 Operate the system to the most limiting factor to prevent system limit violations.

9.5.6 Prepare for and execute load shed as necessary.

10. ANNEX 2: RAYBURN LOAD SHED

10.1 Rayburn maintains a local load shed procedure (Rayburn Document ROP-02) which details the plan for control of load shed. This document is available for review upon request to the appropriate organizations.

10.2 ROP-02 was developed and implemented to ensure that Rayburn Operations Personnel can mitigate the risk of an uncontrolled failure of the ERCOT Interconnection by shedding load or voltage reduction as directed by ERCOT when there is insufficient generation capacity. The general procedure for load shedding in ROP-02 is as follows:

10.3 Preparing for Load Shedding

10.3.1 After determining an emergency condition exists and the potential need to shed firm load:

10.3.1.1 The Rayburn System Operator will notify the Rayburn System Operations Manager or designee.

10.3.1.2 Rayburn System Operators shall follow instructions provided by ERCOT and prepare for planned load shedding.

10.3.2 Rayburn System Operators are responsible for performing the following activities: (Not necessarily sequential).

10.3.2.1 Complying with instructions and the assigned ERCOT load shedding sequence.

10.3.2.2 Coordinating communications with ERCOT and Members.

10.3.2.3 Issue internal staff notifications of possible load shedding.

10.3.2.4 Maintaining appropriate staffing levels of Rayburn System Operators and essential IT and field personnel.

10.3.2.5 Observing and monitoring for transmission operating limits and generation levels.

10.3.2.6 Reporting any public safety considerations or environmental impact issues to Rayburn management and ERCOT.

10.3.2.7 Following ERCOT discretionary adjustments of curtailments as required.

10.3.2.8 Coordinating the cancellation of transmission and generation when required.

10.4 Manual Load Shed Procedure

10.4.1 The Rayburn System Operator will receive load shed instructions from ERCOT in 100 MW blocks.

10.4.2 Rayburn System Operators will communicate load shedding obligations to Members.

10.4.3 Rayburn System Operators are responsible for coordinating and communicating actions with all affected parties.

10.4.4 Rayburn System Operators will report to ERCOT when load shedding obligations have been met.

10.4.5 Rayburn System Operators must coordinate the restoration of any load with ERCOT.

10.4.6 Rayburn System Operators must coordinate with ERCOT as necessary to maintain transmission facilities within normal operating limits during a load shedding event.

10.4.7 Rayburn System Operators are responsible for notifying Members to restore loads after receiving notification from ERCOT that a Load Shed Directive is terminated.

10.5 Registry of Critical Load Customers

10.5.1 Rayburn does not have distribution load, rather our Members supply load at the distribution level. Rayburn is a G&T Cooperative that does not directly serve retail customers (load). Load is served by Rayburn's four (4) Member Cooperatives who maintain registration of their customers including any critical load customers, as defined in §25.497(a)(1)-(4).

11. ANNEX 3: PANDEMIC AND EPIDEMIC RESPONSE PLAN

11.1 Rayburn's Pandemic and Epidemic Response Plan is on file in an unredacted form with ERCOT. The general outline of these plans is as follows:

11.2 As part of Rayburn Country Electric Cooperative, Inc.'s (Rayburn) concern for the health and safety of its employees, Rayburn monitors reports on the global spread of diseases and the possibility of a Pandemic/Epidemic. In the event of a Pandemic/Epidemic, Rayburn will continue to operate in a safe, prudent, and efficient manner. Pandemic/Epidemics are unpredictable in their behavior, timing, and impact. The Pandemic/Epidemic Response Plan (Plan) allows considerable flexibility in its response.

11.3 Rayburn designates a Pandemic/Epidemic Response team who will implement this plan when required.

11.4 Rayburn designates outbreak phases which determine the scope of the actions which care carried out internally. These include Preparation, Recognition, Initiation, Acceleration, and Preparation.

11.5 The actions taken in each phase include reviewing supply issues, monitoring information sources, reviewing and updating policies, developing communication strategies, and managing the event's impacts on the organization.

11.6 A process is implemented for evaluating telecommuting and maintaining readiness to do so.

11.7 The plan contains a method for providing support to Rayburn's personnel so that they may continue to execute their critical roles during a pandemic/epidemic event.

12. ANNEX 4: WILDFIRE MITIGATION (VEGETATION MANAGEMENT)

12.1 Rayburn's Vegetation Management Plan, which contains Rayburn's Wildfire Mitigation Plan, is on file in an unredacted form with ERCOT. The general outline of these plans are as follows:

12.2 Rayburn will manage and maintain vegetation within its transmission Right of Ways (ROW) and at Rayburn Sites. Rayburn may utilize contractors to perform its vegetation management work. Such Rayburn contractors shall mow and perform tree removal of any trees to maintain a clear zone within the boundaries of the Rayburn Sites and ROW and to minimize any wildfire risks. This strategy is to ensure continued reliable, safe operation.

12.3 Rayburn or its contractors shall routinely perform vegetation management work within Rayburn Sites and ROW that is in accordance with the terms of the easement(s).

12.4 Vegetation management work shall include routine inspection and maintenance on each transmission circuit to maintain a clear zone within the ROW, mowing, necessary tree trimming, removal of trees within the ROW, and notification to the Rayburn representative of necessary removal of danger or hazard trees adjacent to the ROW and removal of same if permitted by the adjacent landowner.

12.5 Rayburn contractors shall identify and promptly notify the Rayburn representative of any potential encroachments on the ROW such as a new fence that crosses the ROW. The contractor shall provide documentation, including pictures of each identified potential encroachment to their Rayburn representative.

12.6 Rayburn contractors shall also notify the Rayburn representative of any gates, culverts, low water crossings, etc. that may need to be replaced, repaired, or upgraded.

13. ANNEX 5: HURRICANE PLAN

13.1 The requirement for a Hurricane plan does not apply since Rayburn facilities are located in the ERCOT East, North Central and North weather zones. As such Rayburn and its facilities are not located within a hurricane evacuation zone, as defined by Texas Department of Emergency Management (TDEM).

14. ANNEX 6: CYBER SECURITY ANNEX

14.1 Rayburn maintains a cyber security incident reporting and response plan (Rayburn document CIP-008-ROP-01). The unredacted plan is on file with ERCOT. The general outline of this plan is as follows:

14.1.1 Cyber Security Incident Response Plan Specifications

14.1.1.1 Rayburn maintains a plan specification for identifying, classifying, and responding to Cyber Security Incidents that affect medium impact BES Cyber Systems and their associated EACMS.

14.1.1.2 The plan includes a risk-based approach, which considers the number of cyber security related event occurrences, the probability that the events will have an impact on facilities, and severity of the impact of the event.

14.1.2 Cyber Security Incident Response Plan Implementation and Testing

14.1.2.1 Rayburn tests its Cyber Security Incident Response Plan at least once every 15 calendar months with an operational exercise, a paper drill or tabletop exercise, or by responding to an actual Reportable Cyber Security Incident.

14.1.3 Cyber Security Incident Response Plan Review, Update, and Communication

14.1.3.1 Rayburn documents lessons learned or the absence thereof, updates the plan based on the lessons learned, and notifies personnel associated with any changes within 90 days of the plan test or execution.

14.1.3.2 Rayburn updates the plan and notifies personnel associated within 60 days of a change to any roles and responsibilities, response groups or individuals, or technology that impacts the ability to execute the plan.

14.1.4 Notifications and Reporting for Cyber Security Incidents

14.1.4.1 Rayburn, upon determination that a Cyber Security Incident is a Reportable Cyber Security Incident or a Cyber Security Incident that was an attempt to compromise an applicable system, reports the required attribute information, to the extent known, to the proper authorities as required by NERC, DOE, and ERCOT.

14.1.4.2 Rayburn provides updates to an initial report, if any, to applicable reporting entities within 7 days of the determination of any new or a change to any required attributes.

15. ANNEX 7: PHYSICAL SECURITY INCIDENT PLAN

15.1 Rayburn maintains a physical security identification and response plan (Rayburn document EOP-004-ROP-01). The unredacted plan is on file with ERCOT. The general outline of this plan is as follows:

15.2 Physical Threat Monitoring

Physical threats are unpredictable. Rayburn adheres to strict security protocols and employs physical safeguards such as electronic door locks to protect employees and equipment, with additional security measures applied to Physical Security Perimeters (PSPs).

15.2.1 Rayburn Control Centers operate at least one monitor that displays and records closed-circuit television footage for secured areas. The CCTV footage provides the Control Center with real-time facility monitoring capabilities.

15.2.2 Rayburn Control Centers monitor alarms related to physical facility security. Alarms may report failure conditions related to forced intrusion. Rayburn System Operators are responsible for reporting and maintaining communications with Rayburn management and Emergency Coordinators to ensure that adequate preventive and protective measures can be activated in a timely manner.

15.2.3 For all reported physical threats and imminent danger, Rayburn executive management is responsible for coordinating prevention and response activities, providing instructions for Rayburn staff, and notifying authorities or emergency responders when needed.

15.2.4 Rayburn Operations maintains a mass notification system for broadcasting emergency warnings and instructions to ensure that all Rayburn personnel are notified of situations at Rayburn sites.

15.3 Physical Threat and Intrusion Notification

15.3.1 All Rayburn personnel are responsible for notifying their direct supervisors, Human Resources, assigned emergency personnel or a member of the management team as soon as possible after a physical threat or intrusion is detected.

15.3.2 Fire alarms, smoke detectors, and security alarms are placed prominently throughout Rayburn facilities. Rayburn personnel are instructed to trigger manual fire alarms to

notify fellow employees if a perceived threat is detected. If in doubt, employees should take any measure needed to protect safety, without concern for triggering a false alarm.

15.3.3 Rayburn employs group texts and email notifications to provide advance notice and ongoing instructions to respond appropriately to physical threats.

15.3.4 Rayburn personnel are authorized to report any observed physical or medical emergency by calling 911 for immediate assistance.

16. ANNEX 8: PURA 39.918 EQUIPMENT

16.1 Rayburn does not own or operate any equipment under PURA section 39.918.

17. RAYBURN EOP DRILLS

17.1 Rayburn shall conduct, or participate in, an annual drill where its EOP is activated and tested.

17.2 Rayburn will normally participate in an annual drill conducted by ERCOT to satisfy this requirement.

17.3 In the event that Rayburn activates it EOP due to an actual emergency:

17.3.1 This event will be considered sufficient for meeting the annual drill requirement

17.3.2 Rayburn will indicate that it activated its EOP in the annual EOP submittal to the PUC.

18. RAYBURN REPORTING PROCEDURE

18.1 Upon request by commission staff during an activation of the State Operations Center (SOC) by Texas Department of Emergency Management (TDEM), Rayburn shall provide updates on the status of operations, outages, and restoration efforts as applicable. Rayburn will utilize the Public Utility Commission Online Electronic Form to file reports.

18.2 The Public Utility Commission will have an Online Electronic Form to file reports.

18.3 Reporting will occur NO LESS than TWICE A DAY unless otherwise notified.

18.4 The normal reporting times will be no later than 9:00am and 3:00pm daily UNTIL ALL EVENT RELATED OUTAGES have been RESTORED (unless otherwise notified by commission staff).

18.5 If internet website problems exist, the completed form can be emailed to: emergency@puc.state.tx.us or faxed to the State Operations Center (SOC) at (512) 424-5890.

18.6 FORM INSTRUCTIONS

http://www.puc.texas.gov/industry/communications/forms/event/EVENT_Frm-Inst.pdf

18.7 REPORTING FORM

http://www.puc.texas.gov/industry/communications/forms/event/EVENT_Form.pdf

19. LIST OF ATTACHEMENTS

These attachments are summarized in this document and represent the detailed Emergency response plans used by RCEC:

19.1 EOP-011-ROP-01: Emergency Operations Plan - Full document on file with ERCOT

19.2 ROP-02: Load Shedding and Reduction Procedure - Full document on file with ERCOT

19.3 Rayburn Pandemic and Epidemic Response Plan – Full document on file with ERCOT

19.4 Rayburn Vegetation Management Plan – Full document on file with ERCOT

19.5 CIP-008-ROP-01: Cyber Security Incident Reporting and Response Planning - Full document on file with ERCOT

19.6 EOP-004-ROP-01: Event Reporting Operating Plan – Full document on file with ERCOT